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**UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF CALIFORNIA**  
**FRESNO DIVISION**

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CENTER FOR BIOLOGICAL  
DIVERSITY, THE WILDERNESS  
SOCIETY, FRIENDS OF THE EARTH,  
AND NATURAL RESOURCES  
DEFENSE COUNCIL,

Plaintiffs,

v.

U.S. BUREAU OF LAND  
MANAGEMENT; DEBRA HAALAND, in  
her capacity as Secretary of the U.S.  
Department of the Interior; KAREN  
MOURITSEN, in her capacity as California  
State Director of the U.S. Bureau of Land  
Management; GABRIEL GARCIA, in his  
capacity as the Field Manager of the U.S.  
Bureau of Land Management; JOHN  
HODGE, in his capacity as the Assistant  
Field Manager of Minerals of the U.S.  
Bureau of Land Management; and  
CALIFORNIA RESOURCES  
PRODUCTION CORPORATION dba  
CALIFORNIA RESOURCE  
PRODUCTION CORPORATION,

Defendants.

Case No. 1:23-cv-00938-JLT-CDB

**DECLARATION OF ANDREW  
COCHRANE**

Judge: Hon. Jennifer L. Thurston

1 I, Andrew Cochrane, declare and state:

2 1. I am the Regulatory Compliance Manager for California Resources  
3 Corporation, the parent corporation of California Resources Production Corporation, and I  
4 have held that position since November 2021. Prior to that, I worked as a Senior  
5 Operations Engineer, and have worked in the oil and gas industry since 2011. I have a  
6 Bachelor of Science degree in Petroleum Engineering from Louisiana State University  
7 and a Masters of Business Administration from Arizona State University. I have personal  
8 knowledge of the matters set forth in this declaration and, if called to testify as a witness,  
9 could and would do so under oath.

10 2. I understand from the Complaint for Declaratory and Injunctive Relief (Dkt.  
11 No. 1) filed in the above-captioned matter that this action concerns six applications  
12 submitted to U.S. Bureau of Land Management in July 2022 for permits to drill near  
13 Bakersfield in Kern County, within the Mount Poso oil field.

14 3. The activities contemplated by the applications include the expansion and  
15 grading of five existing well pads, the construction of one additional well pad, the  
16 installation of associated power poles and pipelines, and the drilling of six new wells  
17 (collectively, the "Activities").

18 4. The Activities remain under review by California's Department of  
19 Conservation, Geologic Energy Management Division ("CalGEM"). CRPC does not  
20 intend to proceed with the Activities while CalGEM's review is pending

21 5. Moreover, due to operational considerations unrelated to the allegations in  
22 this action, CRPC will not proceed with the Activities before August 1, 2024.

1 I declare under penalty of perjury under the laws of the State of California that the  
2 foregoing is true and correct. Executed this 6th day of November, 2023, in Long Beach,  
3 California.

4  
5 DocuSigned by:  
6 *Andrew Cochrane*  
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7 Andrew Cochrane